

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,
Petitioner/Judgment Creditor,

v.

AVON CAPITAL, LLC,
Respondent/Judgment Debtor,

ASSET SERVICING GROUP, LLC
Respondent/Garnishee,

SDM HOLDINGS, LLC
Respondent/Garnishee

and

AVON CAPITAL, LLC, a Wyoming
Limited Liability Company,
Intervenor.

Case No. 14-FJ-5-HE

**AVON CAPITAL, LLC, A WYOMING LIMITED
LIABILITY COMPANY'S MOTION TO DISMISS**

Avon Capital, LLC, pursuant to Federal Rule of Civil Procedure 12(b)(1), and (2), moves this Court to dismiss this action for lack of subject matter jurisdiction and personal matter jurisdiction. This motion is supported by a Memorandum in Support, filed simultaneously herewith.

/s/ Alan L. Rupe

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*Attorney for Avon Capital, LLC, a Wyoming
limited liability company*

CERTIFICATE OF SERVICE

I certify that on August 14, 2023, I electronically filed the above Motion to Dismiss, using the CM/ECF System. Based on the records on file, the Clerk of Court will transmit a Notice of Electronic Filing to the counsel of record.

/s/ Alan L. Rupe
Alan L. Rupe